

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

VIRGINIA BLANCO,

Defendant.  
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: SUPERSEDING INDICTMENT  
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: S4 16 Cr. 408 (CS)  
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COUNT ONE  
(Bank Robbery Conspiracy)

The Grand Jury charges:

1. In or about October 2013, in the Southern District of New York and elsewhere, VIRGINIA BLANCO, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, to wit, bank robbery, in violation of Title 18, United States Code, Section 2113.

2. It was a part and an object of the conspiracy that VIRGINIA BLANCO, the defendant, and others known and unknown, knowingly, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management and possession of, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

OVERT ACTS

3. In furtherance of said conspiracy and to effect its illegal object, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 29, 2013, VIRGINIA BLANCO, the defendant, entered a Wells Fargo bank branch located at 500 Odell Avenue in Yonkers, New York (the "Wells Fargo Branch").

b. On or about the same date, BLANCO spoke by phone with one of her co-conspirators ("CC-1").

c. On or about the same date, CC-1 entered the Wells Fargo Branch with two co-conspirators and discharged a firearm while robbing the Wells Fargo Branch.

d. After the robbery of the Wells Fargo Branch, BLANCO received a share of the proceeds from the robbery.

(Title 18, United States Code, Section 371.)

COUNT TWO  
(Bank Robbery)

The Grand Jury further charges:

4. On or about October 29, 2013, in the Southern District of New York and elsewhere, VIRGINIA BLANCO, the defendant, knowingly, by force and violence, and by intimidation, took and attempted to take from the person and presence of another money belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were insured by the

Federal Deposit Insurance Corporation, to wit, BLANCO robbed and aided and abetted the robbery of the Wells Fargo Branch.

(Title 18, United States Code, Sections 2113(a) and 2.)

COUNT THREE  
(Firearms Offense)

The Grand Jury further charges:

5. On or about October 29, 2013, in the Southern District of New York and elsewhere, VIRGINIA BLANCO, the defendant, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, namely, the bank robbery conspiracy charged in Count One and the bank robbery charged in Count Two of this Superseding Indictment, knowingly did use and carry one or more firearms, and, in furtherance of such crime, did possess one or more firearms, one of which firearms was discharged, and did aid and abet the use, carrying, possession, and discharging of one or more firearms.

(Title 18, United States Code, Sections  
924(c)(1)(A)(iii) and 2.)

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

6. As the result of committing the offenses alleged in Counts One and Two of this Superseding Indictment, VIRGINIA BLANCO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds

traceable to the commission of the offenses described in Counts One and Two of this Superseding Indictment.

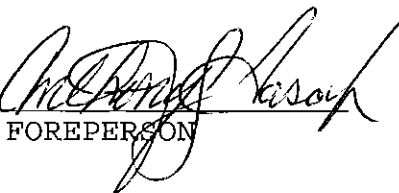
Substitute Assets Provision

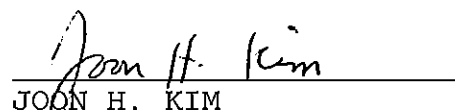
7. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)

  
FOREPERSON

  
JOON H. KIM  
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SUPERSEDING INDICTMENT

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(18 U.S.C. §§ 371, 2113, 924(c), and 2.)

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	JOON H. KIM
Foreperson.	Acting United States
	Attorney.

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